

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X	:
NIKE, INC. and CONVERSE INC.,	:
	:
Plaintiffs,	:
	:
-against-	:
	: No. 2013 Civ. 8012
MARIA WU d/b/a	:
WWW.SHOECAPSXYZ.COM, et al.,	:
	:
Defendants.	:
-----X	:

DECLARATION OF ROBERT L. WEIGEL

I, Robert L. Weigel, hereby declare under penalty of perjury, pursuant to 28 U.S.C. § 1746, that the following is true and correct:

1. I am a member of the bar of this Court and a partner in the law firm of Gibson Dunn & Crutcher LLP, counsel to Next Investments, LLC (“Next”), and former counsel to NIKE, Inc. and Converse Inc. (“Plaintiffs”) in the above-captioned action.

2. I submit this declaration in opposition to nonparties’ Agricultural Bank of China, Bank of Communications Co., Ltd., China Construction Bank, China Merchants Bank, and Industrial and Commercial Bank of China (together the “Moving Banks”) motion to quash Subpoenas and modify the Final Order and in support of Next’s motion for an order to compel nonparties’ Agricultural Bank of China, Bank of China, Bank of Communications Co., Ltd., China Construction Bank, China Merchants Bank, and Industrial and Commercial Bank of China production of documents requested in Next’s Subpoenas.¹

¹ Capitalized terms not defined herein have the meanings set forth in Next’s Memorandum of Law in Opposition to the Moving Parties’ Motion to Quash Subpoenas and Modify the Final Order and in Support of Next’s Motion to Compel the Banks’ Production of Documents Requested in Next’s 2017 Subpoenas.

3. Attached hereto as **Exhibit 1** is a true and correct copy of pages from The Bank Directory (December 2016 – May 2017) of Worldwide Correspondents which reflects that (i) Agricultural Bank of China (“ABC”) has correspondent bank accounts at Bank of America, Citibank, HSBC Bank, JPMorgan Chase, and Wells Fargo Bank; (ii) Bank of China (“BOC”) has correspondent bank accounts at Bank of America, Citibank, Deutsche Bank, and JPMorgan Chase; (iii) Bank of Communications (“BOCOM”) has correspondent bank accounts at Bank of America, Citibank, HSBC Bank, JPMorgan Chase Bank, and Bank of New York Mellon; (iv) China Construction Bank (“CCB”) has correspondent bank accounts at Bank of America, Citibank, Deutsche Bank, JP Morgan Chase Bank, and Wells Fargo Bank; (v) China Merchants Bank (“CMB”) has correspondent bank accounts at Bank of America, Citibank, Deutsche Bank, HSBC Bank, JPMorgan Chase Bank, Bank of New York Mellon, and Wells Fargo Bank; and (vi) Industrial and Commercial Bank of China (“ICBC”) has correspondent bank accounts at Bank of America, Citibank, JPMorgan Chase Bank, Bank of New York Mellon, and Wells Fargo.

4. Attached hereto as **Exhibit 2** is a true and correct copy of a record from the New York State Department of Finance of Chartered Institutions in New York as of December 31, 2012, which indicates that ABC is chartered at 277 Park Avenue, New York, New York 10172 as of June 12, 2012; CCB is chartered at 1095 Avenue of the Americas New York, New York 10026 as of February 18, 2009; CMB is chartered at 525 Madison Avenue, New York, New York 10022 as of July 14, 2008; and ICBC is chartered at 725 Fifth Avenue, New York, New York 10022 as of September 16, 2008.

5. Attached hereto as **Exhibit 3** is a true and correct copy of ABC's Responses and Objections to Next's Subpoena *Duces Tecum*, dated January 17, 2018.

6. Attached hereto as **Exhibit 4** is a true and correct copy of a search result from the New York City Department of Finance Office of the City Register Automated City Register Information Systems ("ACRIS") which indicates ABC has property in Manhattan.

7. Attached hereto as **Exhibit 5** is a true and correct copy of a Recording and Endorsement Cover Page from the New York City Department of Finance Office of the City Register which indicates that ABC has property in Manhattan at 375 Park Avenue in New York, New York.

8. Attached hereto as **Exhibit 6** is a true and correct copy of search results for ABC from the New York State Department of State, Uniform Commercial Code.

9. Attached hereto as **Exhibit 7** is a true and correct copy of a record from The Clearing House Payments Company which indicates that ABC is a CHIPS Participant.

10. Attached hereto as **Exhibit 8** is a true and correct copy of a record from The Clearing House Payments Company which indicates that ABC's New York Branch is a CHIPS Participant.

11. Attached hereto as **Exhibit 9** is a true and correct copy of excerpts from the Clearing House Interbank Payment System's ("CHIPS") "Self-Assessment of Compliance with Core Principles for Systematically Important Payment Systems," at 11-12, 57-60 a full version of which is also available at <https://www.theclearinghouse.org/-/media/files/payco%20files/standards%20self%20assessment%202016.pdf?la=en> (last visited March 8, 2018).

12. Attached hereto as **Exhibit 10** is a true and correct copy of the Federal Financial Institution Examination Council's "FFIEC IT Examination Handbook—CHIPS," available at [https://ithandbook.ffiec.gov/it-booklets/wholesale-payment-systems/interbank-payment-and-messaging-systems/fedwire-and-clearing-house-interbank-payments-system-\(chips\)/chips.aspx](https://ithandbook.ffiec.gov/it-booklets/wholesale-payment-systems/interbank-payment-and-messaging-systems/fedwire-and-clearing-house-interbank-payments-system-(chips)/chips.aspx) (last visited February 27, 2018).

13. Attached hereto as **Exhibit 11** is a true and correct copy from the Fedwire directory which indicates ABC is a Fedwire participant.

14. Attached hereto as **Exhibit 12** is a true and correct copy of excerpts from the Federal Reserve Bank Services' "Federal Reserve Banks Operating Circular No. 1: Account Relationships," a full version of which is also available at <https://www.frb services.org/assets/resources/rules-regulations/020113-operating-circular-1.pdf> (last visited March 8, 2018).

15. Attached hereto as **Exhibit 13** is a true and correct copy of excerpts from the Federal Reserve Bank Services' "Federal Reserve Banks Operating Circular No. 6: Funds Transfer Through the Fedwire Funds Service," a full version of which is also available at <https://www.frb services.org/assets/resources/rules-regulations/operating-circular-6-102917.pdf>. (last visited February 27, 2018).

16. Attached hereto as **Exhibit 14** is a true and correct copy of a search result from the New York Department of Financial Services ("DFS") which indicates that ABC is registered with and supervised by DFS.

17. Attached hereto as **Exhibit 15** is a true and correct copy of a press release, dated November 4, 2016, from the New York Department of Finance, "DFS Fines Agricultural Bank

of China \$215 Million for Violating Anti-Money Laundering Laws and Masking Potentially Suspicious Financial Transactions.”

18. Attached hereto as **Exhibit 16** is a true and correct copy of an order, dated November 4, 2016, from the New York Department of Finance, “Consent Order Under New York Banking Law §§ 39 and 44” for ABC and ABC New York Branch.

19. Attached hereto as **Exhibit 17** is a true and correct copy of a webpage from ABC’s website, “ABC’s New York Bank Launches USD Clearing Business,” which can be found at http://www.abchina.com/en/enold/about-us/news/201311/t20131114_405411.htm.

20. Attached hereto as **Exhibit 18** is a true and correct copy of a webpage from ABC’s website, “Agricultural Bank of China New York Branch Successfully Launched the Dollar Clearing Business,” which can be found at http://www.us.abchina.com/en/newsroom/201310/t20131024_397903.htm.

21. Attached hereto as **Exhibit 19** is a true and correct copy of a webpage from ABC’s website, “Agricultural Bank of China Inaugurates New York Branch,” which can be found at http://www.us.abchina.com/en/newsroom/201208/t20120803_257943.htm.

22. Attached hereto as **Exhibit 20** is a true and correct copy of a webpage from ABC’s website, “Remittance,” which can be found at http://www.us.abchina.com/en/product_services/settlement/201208/t20120803_257930.htm.

23. Attached hereto as **Exhibit 21** is a true and correct copy of a webpage from ABC’s website, “Agricultural Bank of China New York Representative Office,” which can be found at <http://www.abchina.com/en/AboutUs/AboutAabc/network/overseas-branches/new-york-branches/>.

24. Attached hereto as **Exhibit 22** is a true and correct copy of a webpage from ABC's website, "Collection," which can be found at http://www.us.abchina.com/en/product_services/settlement/201208/t20120803_257929.htm.

25. Attached hereto as **Exhibit 23** is a true and correct copy of a webpage from ABC's website, "ABC NY Launched Online Direct FEDWIRE Processing," which can be found at http://www.us.abchina.com/en/newsroom/201404/t20140417_457234.htm.

26. Attached hereto as **Exhibit 24** is a true and correct copy of a webpage from ABC's website, "AML Statement," which can be found at <http://www.us.abchina.com/en/Legal/>.

27. Attached hereto as **Exhibit 25** is a true and correct copy of a webpage from ABC's website, "Job Opportunities," which can be found at <http://www.us.abchina.com/en/careers/>.

28. Attached hereto as **Exhibit 26** is a true and correct copy of a webpage from ABC's website, "Foreign Currency Demand Deposit," which can be found at <http://www.abchina.com/en/personal/deposit/fcdd/>.

29. Attached hereto as **Exhibit 27** is a true and correct copy of a webpage from ABC's website, "ABC New York Branch's First Cross-Border RMB Foreign Exchange Deal," which can be found at http://www.us.abchina.com/en/newsroom/201302/t20130225_319258.htm.

30. Attached hereto as **Exhibit 28** is a true and correct copy of a webpage from ABC's website, "Agricultural Bank of China New York Branch Successfully Issued \$1.25bn MTN," which can be found at http://www.us.abchina.com/en/newsroom/201605/t20160513_883348.htm.

31. Attached hereto as **Exhibit 29** is a true and correct copy of a webpage from ABC's website, "ABC New York Branch 2016 China Visiting Program," which can be found at http://www.us.abchina.com/en/newsroom/201701/t20170110_969653.htm.

32. Attached hereto as **Exhibit 30** is a true and correct copy of a webpage from ABC's website, "Marketing Event in Shanghai," which can be found at http://www.us.abchina.com/en/newsroom/201303/t20130314_323017.htm.

33. Attached hereto as **Exhibit 31** is a true and correct copy of a webpage in Chinese from ABC website, "Waihuibao," which can be found at <http://www.abchina.com/cn/Ebanking/Personal/Servicesandfunctions/Personalforeignexchangebusiness/Foreignexchange Arbitrage/#>, followed by a certified English translation of the webpage.

34. Attached hereto as **Exhibit 32** is a true and correct copy of BOCOM's Responses and Objections to Next's Subpoena *Duces Tecum*, dated January 17, 2018.

35. Attached hereto as **Exhibit 33** is a true and correct copy of a document produced by Citibank, a bank at which BOCOM has a correspondent account, on August 17, 2017, for a wire transfer for \$2,196.99 on December 7, 2011 to Judgement Debtor's account ending in 0092 as the beneficiary.

36. In accordance with Fed. R. Civ. P. 5.2(a), the bank account number referenced in Exhibit 33 has been redacted so that only the last four digits are visible.

37. Attached hereto as **Exhibit 34** is a true and correct copy of a search result from ACRIS which indicates BOCOM has property in Manhattan and Queens.

38. Attached hereto as **Exhibit 35** is a true and correct copy of a search result from the National Information Center, a central repository of data about banks for which the Federal

Reserve has a supervisory or regulatory interest in, which indicates that BOCOM is located at 55 Broadway 31st and 32nd Floor, New York, New York, 10006.

39. Attached hereto as **Exhibit 36** is a true and correct copy of a Recording and Endorsement Cover Page from the New York City Department of Finance Office of the City Register, dated November 8, 2002, which indicates that BOCOM has a mortgage on property at 137 Grand Street, New York, New York.

40. Attached hereto as **Exhibit 37** is a true and correct copy of search results for BOCOM from the New York State Department of State, Uniform Commercial Code.

41. Attached hereto as **Exhibit 38** is a true and correct copy of a record from The Clearing House Payments Company which indicates that BOCOM New York is a CHIPS Participant.

42. Attached hereto as **Exhibit 39** is a true and correct copy of a record from The Clearing House Payments Company which indicates that BOCOM is a CHIPS Participant.

43. Attached hereto as **Exhibit 40** is a true and correct copy from the Fedwire directory which indicates BOCOM is a Fedwire participant.

44. Attached hereto as **Exhibit 41** is a true and correct copy of a webpage from BOCOM's website, "Personal Savings in Local and Foreign Currencies," which can be found at www.bankcomm.com/BankCommSite/shtml/zonghang/en/3212/3227/3229/33722.shtml?channelId=3212.

45. Attached hereto as **Exhibit 42** is a true and correct copy of a webpage from BOCOM's website, "Personal Forex Wealth Management," which can be found at <http://www.bankcomm.com/BankCommSite/shtml/zonghang/en/3162/3168/list.shtml?channelId=3162%5b2/22/2018%2012:00:34%20PM%5d>.

46. Attached hereto as **Exhibit 43** is a true and correct copy of a webpage from BOCOM's website, "Offshore Banking," which can be found at <http://www.bankcomm.com/BankCommSite/shtml/zonghang/en/3162/3172/list.shtml?channelId=3162>.

47. Attached hereto as **Exhibit 44** is a true and correct copy of a webpage in Chinese from BOCOM website, "Financial Institution Business," which can be found at <http://www.bankcomm.com/BankCommSite/shtml/jyjr/cn/7755/7889/7891/42399.shtml?channelId=7755>[2/22/2018 11:22:38 AM], followed by a certified English translation of the webpage.

48. Attached hereto as **Exhibit 45** is a true and correct copy of a webpage in Chinese from BOCOM website, "Corporate Services," which can be found at <http://www.bankcomm.com/BankCommSite/shtml/jyjr/cn/7755/7889/7891/43642.shtml?channelId=7755>[2/22/2018 11:22:14 AM], followed by a certified English translation of the webpage.

49. Attached hereto as **Exhibit 46** is a true and correct copy of a webpage in Chinese from BOCOM website, "Specialty Services," which can be found at <http://www.bankcomm.com/BankCommSite/shtml/jyjr/cn/7755/7889/7891/42406.shtml?channelId=7755>[2/22/2018 11:23:07 AM], followed by a certified English translation of the webpage.

50. Attached hereto as **Exhibit 47** is a true and correct copy of a webpage in Chinese from BOCOM website, "Rongyuantong: Cross-border RMB Financial Services," which can be found at <http://www.bankcomm.com/BankCommSite/html/kjrmb/include/jh/financial.html?tabfirst=account>, followed by a certified English translation of the webpage.

51. Attached hereto as **Exhibit 48** is a true and correct copy of CMB's Responses and Objections to Next's Subpoena *Duces Tecum*, dated January 17, 2018.

52. Attached hereto as **Exhibit 49** is a true and correct copy of a wire transfer record produced by Citibank, a bank at which CMB has a correspondent account, on August 17, 2017, for a wire transfer for \$2,997.24 on October 28, 2011 to Judgment Debtor's CMB account ending in 0586 as the beneficiary.

53. Attached hereto as **Exhibit 50** is a true and correct copy of a wire transfer record produced by Citibank, a bank at which CMB has a correspondent account, on August 17, 2017, for two wire transfers totaling \$12,229.46 on January 18, 2013 and June 12, 2013 to Judgment Debtor's CMB account ending in 8756 as the beneficiary.

54. Attached hereto as **Exhibit 51** is a true and correct copy of a wire transfer record produced by Citibank, a bank at which CMB has a correspondent account, on August 17, 2017, for a wire transfer for \$8,014.44 on November 7, 2011 to Judgment Debtor's CMB account ending in 0635 as the beneficiary.

55. Attached hereto as **Exhibit 52** is a true and correct copy of a wire transfer record produced by Citibank, a bank at which CMB has a correspondent account, on August 17, 2017, for a wire transfer for \$2,156.95 on May 4, 2012 to Judgment Debtor's CMB account ending in 4628 as the beneficiary.

56. Attached hereto as **Exhibit 53** is a true and correct copy of a wire transfer record produced by Citibank, a bank at which CMB has a correspondent account, on August 17, 2017, for a wire transfer for 6,580.00 on December 2, 2011 to Judgment Debtor's CMB account ending in 0297 as the beneficiary.

57. Attached hereto as **Exhibit 54** is a true and correct copy of a wire transfer record produced by Citibank, a bank at which CMB has a correspondent account, on August 17, 2017,

for a wire transfer for \$7,131.13 on May 4, 2012 to Judgment Debtor's CMB account ending in 4782 as the beneficiary.

58. Attached hereto as **Exhibit 55** is a true and correct copy of a wire transfer record produced by Citibank, a bank at which CMB has a correspondent account, on August 17, 2017, for a wire transfer for \$8,802.83 on April 5, 2012 to Judgment Debtor's CMB account ending in 7441 as the beneficiary.

59. Attached hereto as **Exhibit 56** is a true and correct copy of a wire transfer record produced by Citibank, a bank at which CMB has a correspondent account, on August 17, 2017, for a wire transfer for \$1,425.55 on January 31, 2012 to Judgment Debtor's CMB account ending in 4545 as the beneficiary.

60. Attached hereto as **Exhibit 57** is a true and correct copy of a wire transfer record produced by Citibank, a bank at which CMB has a correspondent account, on August 17, 2017, for a wire transfer for \$5,955.12 on January 8, 2013 to Judgment Debtor's CMB account ending in 7686 as the beneficiary.

61. Attached hereto as **Exhibit 58** is a true and correct copy of a wire transfer record produced by Citibank, a bank at which CMB has a correspondent account, on August 17, 2017, for a wire transfer for \$4,542.47 on November 10, 2011 to Judgment Debtor's CMB account ending in 0643 as the beneficiary.

62. Attached hereto as **Exhibit 59** is a true and correct copy of a wire transfer record produced by Citibank, a bank at which CMB has a correspondent account, on August 17, 2017, for a wire transfer for \$3,389.90 on October 31, 2011 to Judgment Debtor's CMB account ending in 0636 as the beneficiary.

63. Attached hereto as **Exhibit 60** is a true and correct copy of a wire transfer record produced by Citibank, a bank at which CMB has a correspondent account, on August 17, 2017, for a wire transfer for \$5,316.99 on April 10, 2014 to Judgment Debtor's CMB account ending in 3347 as the beneficiary.

64. Attached hereto as **Exhibit 61** is a true and correct copy of a wire transfer record produced by Citibank, a bank at which CMB has a correspondent account, on August 17, 2017, for a wire transfer for \$3,133.42 on February 21, 2013 to Judgment Debtor's CMB account ending in 4119 as the beneficiary.

65. Attached hereto as **Exhibit 62** is a true and correct copy of a wire transfer record produced by Citibank, a bank at which CMB has a correspondent account, on August 17, 2017, for a wire transfer for \$10,252.24 on August 20, 2013 to Judgment Debtor's CMB account ending in 2338 as the beneficiary.

66. In accordance with Fed. R. Civ. P. 5.2(a), the bank account numbers referenced in Exhibits 49-62 have been redacted so that only the last four digits are visible.

67. Attached hereto as **Exhibit 63** is true and correct copy of a search result from ACRIS, which indicates CMB has property in Queens.

68. Attached hereto as **Exhibit 64** is a true and correct copy of a Recording and Endorsement Cover Page from the New York City Department of Finance Office of the City Register, dated May 23, 2016, which indicates that CMB has a mortgage on property at 227-15 North Conduit Avenue, Queens, New York.

69. Attached hereto as **Exhibit 65** is a true and correct copy of search results for CMB from the New York State Department of State, Uniform Commercial Code.

70. Attached hereto as **Exhibit 66** is a true and correct copy of a record from The Clearing House Payments Company, which indicates that CMB is a CHIPS Participant.

71. Attached hereto as **Exhibit 67** is a true and correct copy from the Fedwire directory, which indicates CMB a Fedwire participant.

72. Attached hereto as **Exhibit 68** is a true and correct copy of a search result from the DFS, which indicates that CMB is registered with and supervised by DFS.

73. Attached hereto as **Exhibit 69** is a true and correct copy of a Press Release from the New York State Banking Department, “New York State Banking Department Licenses China Merchants Bank; First New Chinese Branch to Open in U.S. in 17 Years,” dated July 14, 2008.

74. Attached hereto as **Exhibit 70** is a true and correct copy of a webpage from CMB’s website, “Advantages of the Branch,” which can be found at https://us.cmbchina.com/EN/AboutUs/NYDesc/fhys_en.htm.

75. Attached hereto as **Exhibit 71** is a true and correct copy of a webpage from CMB’s website, “Remittance Services,” which can be found at https://us.cmbchina.com/EN/Specialty/Settlement/jsyw_en.htm.

76. Attached hereto as **Exhibit 72** is a true and correct copy of a webpage from CMB’s website, “Interbank Financing,” which can be found at https://us.cmbchina.com/EN/Specialty/Finance/tykhrz_en.htm.

77. Attached hereto as **Exhibit 73** is a true and correct copy of a webpage from CMB’s website, “Overview,” which can be found at https://us.cmbchina.com/EN/AboutUs/NYDesc/fhjj_en.htm.

78. Attached hereto as **Exhibit 74** is a true and correct copy of a webpage from CMB's website, "Private Banking," which can be found at <https://us.cmbchina.com/EN/Bank/BankDefault.aspx>.

79. Attached hereto as **Exhibit 75** is a true and correct copy of a webpage from CMB's website, "About New York Branch," which can be found at <https://us.cmbchina.com/EN/>.

80. Attached hereto as **Exhibit 76** is a true and correct copy of a webpage from CMB's website, "International Business Introduction, Why Choose CMB for International Business?" which can be found at <http://english.cmbchina.com/Corporate/International/>.

81. Attached hereto as **Exhibit 77** is a true and correct copy of a webpage from CMB's website, "Checking Account," which can be found at https://us.cmbchina.com/EN/Specialty/Account/zpzh_en.htm.

82. Attached hereto as **Exhibit 78** is a true and correct copy of a webpage from CMB's website, "Current Deposit Account," which can be found at https://us.cmbchina.com/EN/Specialty/Account/hqckzh_en.htm.

83. Attached hereto as **Exhibit 79** is a true and correct copy of a webpage from CMB's website, "Foreign Exchange," which can be found at <http://english.cmbchina.com/Corporate/International/DetailInfo.aspx?guid=bcd6b1f3-9a8e-4088-9eda-f7b4723b0974>.

84. Attached hereto as **Exhibit 80** is a true and correct copy of a webpage from CMB's website, "Retail Deposit Interest Rate Table of China Merchants Bank," which can be found at <http://english.cmbchina.com/Rate/InterestRate.aspx>.

85. Attached hereto as **Exhibit 81** is a true and correct copy of a record from the National Information Center, a central repository of data about banks for which the Federal Reserve has a supervisory or regulatory interest in, which shows CMB has an office at 525 Madison Avenue, New York New York.

86. Attached hereto as **Exhibit 82** is a true and correct copy of CCB's Responses and Objections to Next's Subpoena *Duces Tecum*, dated January 17, 2018.

87. Attached hereto as **Exhibit 83** is a true and correct copy of a wire transfer record produced by Citibank, a bank at which CCB has a correspondent account, on August 17, 2017, for a wire transfer for \$1,713.24 on May 29, 2012 to Judgment Debtor's CCB account ending in 1200 as the beneficiary.

88. Attached hereto as **Exhibit 84** is a true and correct copy of a wire transfer record produced by Citibank, a bank at which CCB has a correspondent account, on August 17, 2017, for a wire transfer for \$7,535.00 on October 3, 2008 to Judgment Debtor's CCB account ending in 8888 as the beneficiary.

89. Attached hereto as **Exhibit 85** is a true and correct copy of a wire transfer record produced by Citibank, a bank at which CCB has a correspondent account, on August 17, 2017, for two wire transfers totaling \$25,130.00 on July 24, 2009 and August 28, 2009 to Judgment Debtor's CCB account ending in 2207 as the beneficiary.

90. In accordance with Fed. R. Civ. P. 5.2(a), the bank account numbers referenced in Exhibits 83-85 have been redacted so that only the last four digits are visible.

91. **Exhibit 86** has been left intentionally blank.

92. Attached hereto as **Exhibit 87** is a true and correct copy of a search result from ACRIS, which indicates CCB has property in Brooklyn.

93. Attached hereto as **Exhibit 88** is a true and correct copy of search results for CCB from the New York State Department of State, Uniform Commercial Code.

94. Attached hereto as **Exhibit 89** is a true and correct copy of a record from The Clearing House Payments Company, which indicates that CCB is a CHIPS Participant.

95. Attached hereto as **Exhibit 90** is a true and correct copy from the Fedwire directory, which indicates CCB is a Fedwire participant.

96. Attached hereto as **Exhibit 91** is a true and correct copy of a search result from the DFS which indicates that CCB is registered with and supervised by DFS.

97. Attached hereto as **Exhibit 92** is a true and correct copy of a webpage from CCB's website, "About Us," which can be found at <http://us.ccb.com/newyork/en/gywm.html>.

98. Attached hereto as **Exhibit 93** is a true and correct copy of a webpage from CCB's website, "USD Clearing," which can be found at http://us.ccb.com/newyork/en/cpfw/20120530_9518196280.html.

99. Attached hereto as **Exhibit 94** is a true and correct copy of a webpage from CCB's website, "CCB NY Began to provide credit card clearing services for bank clients," which can be found at <http://us.ccb.com/newyork/en/ggxx/201509141442193984.html>.

100. Attached hereto as **Exhibit 95** is a true and correct copy of a webpage from CCB's website, "Loan," which can be found at http://us.ccb.com/newyork/en/cpfw/20150911_205465151.html.

101. Attached hereto as **Exhibit 96** is a true and correct copy of a webpage from CCB's website, "Trade Finance," which can be found at http://us.ccb.com/newyork/en/cpfw/20150911_664546560.html.

102. Attached hereto as **Exhibit 97** is a true and correct copy of a webpage from CCB's website, "Trade Service," which can be found at http://us.ccb.com/newyork/en/cpfw/20150911_831917311.html.

103. Attached hereto as **Exhibit 98** is a true and correct copy of a webpage from CCB's website, "CCB NY executes first RMB trade finance and settlement transaction in US market," which can be found at <http://us.ccb.com/newyork/en/ggxx/201205291338276999.html>.

104. Attached hereto as **Exhibit 99** is a true and correct copy of a webpage from CCB's website, "Liquidity Management," which can be found at http://us.ccb.com/newyork/en/cpfw/20150914_231892645.html.

105. Attached hereto as **Exhibit 100** is a true and correct copy of a webpage from CCB's website, "Products and Services," which can be found at <http://us.ccb.com/newyork/en/cpfw.html>.

106. Attached hereto as **Exhibit 101** is a true and correct copy of a webpage from CCB's website, "Foreign Currency Deposits," which can be found at http://www.ccb.com/en/deposit-service/20090615_1245049651.html.

107. Attached hereto as **Exhibit 102** is a true and correct copy of ICBC's Responses and Objections to Plaintiff's Subpoena *Duces Tecum*, dated January 17, 2018.

108. Attached hereto as **Exhibit 103** is a true and correct copy of a letter from R. Weigel to P. Carberry, dated October 24, 2017, providing ICBC with notice of the Final Order.

109. Attached hereto as **Exhibit 104** is a true and correct copy of a wire transfer record produced by Citibank, a bank at which ICBC has a correspondent account, on August 17, 2017, for 11 wire transfers totaling \$67,607.70 from February 17, 2010 through June 2, 2011 to Judgment Debtor's ICBC account ending in 5012 as the beneficiary.

110. Attached hereto as **Exhibit 105** is a true and correct copy of a wire transfer record produced by Citibank, a bank at which ICBC has a correspondent account, on August 17, 2017, for a wire transfer for \$3,147.59 on August 29, 2011 to Judgment Debtor's ICBC account ending in 7390 as the beneficiary.

111. Attached hereto as **Exhibit 106** is a true and correct copy of a wire transfer record produced by Citibank, a bank at which ICBC has a correspondent account, on August 17, 2017, for a wire transfer for \$1,952.33 on May 21, 2013 to Judgment Debtor's ICBC account ending in 9000 as the beneficiary.

112. Attached hereto as **Exhibit 107** is a true and correct copy of a wire transfer record produced by Citibank, a bank at which ICBC has a correspondent account, on August 17, 2017, for 13 wire transfers totaling \$49,371.78 from September 9, 2008 through July 16, 2009 to Judgment Debtor's ICBC account ending in 1682 as the beneficiary.

113. Attached hereto as **Exhibit 108** is a true and correct copy of a wire transfer record produced by Citibank, a bank at which ICBC has a correspondent account, on August 17, 2017, for a wire transfer for \$5,714.04 on December 27, 2012 to Judgment Debtor's ICBC account ending in 0349 as the beneficiary.

114. In accordance with Fed. R. Civ. P. 5.2(a), the bank account numbers referenced in Exhibits 104-108 have been redacted so that only the last four digits are visible.

115. Attached hereto as **Exhibit 109** is true and correct copy of a search result from ACRIS, which indicates ICBC has property in Manhattan.

116. Attached hereto as **Exhibit 110** is a true and correct copy of an FDIC Report for ICBC, which indicates that ICBC is an active bank, insured since February 14, 1983, with headquarters at 1633 Broadway, New York, New York 10019.

117. Attached hereto as **Exhibit 111** is a true and correct copy of search results for ICBC from the New York State Department of State, Uniform Commercial Code.

118. Attached hereto as **Exhibit 112** is a true and correct copy of a record from the New York City Department of Finance Office of the City Register, which indicates that ICBC has a mortgage on a property located at 509 East 6th Street in New York, New York.

119. Attached hereto as **Exhibit 113** is a true and correct copy of a record from The Clearing House Payments Company, which indicates that ICBC is a CHIPS Participant.

120. Attached hereto as **Exhibit 114** is a true and correct copy from the Fedwire directory, which indicates ICBC is a Fedwire participant.

121. Attached hereto as **Exhibit 115** is a true and correct copy of a search result from the DFS, which indicates that ICBC is registered with and supervised by DFS.

122. Attached hereto as **Exhibit 116** is a true and correct copy of a webpage from ICBC's website, "ICBC New York Branch Clears over 1 Trillion US Dollar Transactions," which can be found at <http://www.icbc.com.cn/icbc/icbc%20news/icbc%20new%20york%20branch%20clears%20over%201%20trillion%20us%20dollar%20transactions.htm>.

123. Attached hereto as **Exhibit 117** is a true and correct copy of a webpage from ICBC's website, "USD Clearing & RMB," which can be found at <http://www.icbkus.com/ICBC/%E6%B5%B7%E5%A4%96%E5%88%86%E8%A1%8C/%E7%BA%BD%E7%BA%A6%E7%BD%91%E7%AB%99/en/ProductsServices1/ClearingRMB/>.

124. Attached hereto as **Exhibit 118** is a true and correct copy of a webpage from ICBC's website, "Introduction," which can be found at

<http://www.icbkus.com/ICBC/%E6%B5%B7%E5%A4%96%E5%88%86%E8%A1%8C/%E7%BA%BD%E7%BA%A6%E7%BD%91%E7%AB%99/en/AboutUs1/Introduction/>.

125. Attached hereto as **Exhibit 119** is a true and correct copy of a webpage from ICBC's website, "Memorabilia," which can be found at <http://www.icbkus.com/ICBC/%E6%B5%B7%E5%A4%96%E5%88%86%E8%A1%8C/%E7%BA%BD%E7%BA%A6%E7%BD%91%E7%AB%99/en/AboutUs1/Memorabilia/>.

126. Attached hereto as **Exhibit 120** is a true and correct copy of a webpage from ICBC's website, "Foreign Exchange Deposit," which can be found at <http://www.icbc.com.cn/ICBC/Corporate%20Banking/Corporate%20Deposit/Foreign%20Exchange%20Deposit/>.

127. Attached hereto as **Exhibit 121** is a true and correct copy of a webpage from ICBC's website, "Contact Us," which can be found at <http://www.icbkus.com/ICBC/%E6%B5%B7%E5%A4%96%E5%88%86%E8%A1%8C/%E7%BA%BD%E7%BA%A6%E7%BD%91%E7%AB%99/en/CustomerService/ContactUs/>.

128. Attached hereto as **Exhibit 122** is a true and correct copy of a webpage from ICBC's website, "RMB Remittance."

129. Attached hereto as **Exhibit 123** is a true and correct copy of a letter from R. Weigel to R. De Palma, counsel for BOC, dated October 24, 2017, providing notice of the Final Order.

130. Attached hereto as **Exhibit 124** is a true and correct copy of a letter from R. Weigel to R. DePalma, dated October 26, 2017.

131. Attached hereto as **Exhibit 125** is a true and correct copy of a letter from R. Weigel to R. DePalma, dated November 30, 2017.

132. Attached hereto as **Exhibit 126** is a true and correct copy of an email from R. DePalma to Next's counsel, dated December 6, 2017.

133. Attached hereto as **Exhibit 127** is a true and correct copy of BOC's Responses and Objections to Requests by Plaintiffs to Produce Documents and Information, dated October 20, 2017.

134. Attached hereto as **Exhibit 128** is a true and correct copy of BOC's Responses and Objections to the Subpoena to Produce Documents, Information, or Objects or To Permit Inspection of Premises in a Civil Action, dated January 8, 2018.

135. Attached hereto as **Exhibit 129** is a true and correct copy of a wire transfer record produced by BOC, on October 20, 2017, for a wire transfer for \$520 on January 1, 2014 to Judgment Debtor's account ending in 2751 as the beneficiary.

136. Attached hereto as **Exhibit 130** is a true and correct copy of a wire transfer record produced by BOC, on October 20, 2017, for a wire transfer for \$304 on February 3, 2015 to Judgment Debtor's account ending in 2751 as the beneficiary, for "Nike Shoes."

137. Attached hereto as **Exhibit 131** is a true and correct copy of a wire transfer record produced by BOC, on October 20, 2017, for a wire transfer for \$97.23 on May 29, 2015 to Judgment Debtor's account ending in 6324 as the beneficiary.

138. Attached hereto as **Exhibit 132** is a true and correct copy of a wire transfer record produced by BOC, on October 20, 2017, for a wire transfer for \$477.52 on June 13, 2016 to Judgment Debtor's account ending in 2751 as the beneficiary.

139. Attached hereto as **Exhibit 133** is a true and correct copy of a wire transfer record produced by BOC, on October 20, 2017, for a wire transfer for \$447.52 on July 11, 2016 to Judgment Debtor's account ending in 2751 as the beneficiary.

140. Attached hereto as **Exhibit 134** is a true and correct copy of a wire transfer record produced by BOC, on October 20, 2017, for a wire transfer for \$218.20 on December 23, 2016 to Judgment Debtor's account ending in 6324 as the beneficiary.

141. Attached hereto as **Exhibit 135** is a true and correct copy of wire transfer records produced by BOC, on January 8, 2018, for the following wire transfers:

- a. A wire transfer for \$78.00 on August 24, 2011 to Judgment Debtor's account ending in 5787 as the beneficiary. Ex. 135 at 1.
- b. A wire transfer for \$83.89 on October 26, 2012 to Judgment Debtor's account ending in 5787 as the beneficiary. Ex. 135 at 4.
- c. A wire transfer for \$357.00 on December 6, 2012 to Judgment Debtor's account ending in 5787 as the beneficiary. Ex. 135 at 7.
- d. A wire transfer for \$408.37 on October 16, 2013 to Judgment Debtor's account ending in 5787 as the beneficiary. Ex. 135 at 10.
- e. A wire transfer for \$238.39 on October 16, 2013 to Judgment Debtor's account ending in 5787 as the beneficiary. Ex. 135 at 13.
- f. A wire transfer for \$525.60 on January 17, 2012 to Judgment Debtor's account ending in 2514 as the beneficiary. Ex. 135 at 16.
- g. A wire transfer for \$68.00 on February 22, 2012 to Judgment Debtor's account ending in 2514 as the beneficiary. Ex. 135 at 19.
- h. A wire transfer for \$69.60 on June 22, 2012 to Judgment Debtor's account ending in 5786 as the beneficiary. Ex. 135 at 22.
- i. A wire transfer for \$466.00 on August 15, 2012 to Judgment Debtor's account ending in 5786 as the beneficiary. Ex. 135 at 25.

- j. A wire transfer for \$2,202.30 on December 27, 2012 to Judgment Debtor's account ending in 2751 as the beneficiary. Ex. 135 at 28.
- k. A wire transfer for \$225.12 on January 23, 2012 to Judgment Debtor's account ending in 2751 as the beneficiary. Ex. 135 at 30.
- l. A wire transfer for \$70.00 on April 4, 2013 to Judgment Debtor's account ending in 5786 as the beneficiary, for a pair of "nike air jordan 3 anti fur grey black red EUR39" sneakers. Ex. 135 at 33.
- m. A wire transfer for \$101.28 on September 24, 2013 to Judgment Debtor's account ending in 2751 as the beneficiary. Ex. 135 at 36.
- n. A wire transfer for \$520.00 on January 9, 2014 to Judgment Debtor's account ending in 2751 as the beneficiary. Ex. 135 at 39.
- o. A wire transfer for \$40.00 on April 17, 2014 to Judgment Debtor's account ending in 5786 as the beneficiary. Ex. 135 at 42.
- p. A wire transfer for \$304.00 on February 3, 2015 to Judgment Debtor's account ending in 2751 as the beneficiary, for "Nike Shoes." Ex. 135 at 45.
- q. A wire transfer for \$97.23 on May 29, 2015 to Judgment Debtor's account ending in 6324 as the beneficiary, for a transaction from "WWW.REPNICKEKICKS.RU." Ex. 135 at 48.
- r. A wire transfer for \$477.52 on June 13, 2016 to Judgment Debtor's account ending in 2751 as the beneficiary. Ex. 135 at 51.
- s. A wire transfer for \$447.52 on July 11, 2016 to Judgment Debtor's account ending in 2751 as the beneficiary. Ex. 135 at 54.

- t. A wire transfer for \$218.20 on December 23, 2016 to Judgment Debtor's account ending in 6324 as the beneficiary. Ex. 135 at 57.

142. Attached hereto as **Exhibit 136** is a true and correct copy of a wire transfer record produced by Citibank, a bank at which BOC has a correspondent account, on August 7, 2017, for a wire transfer for \$8,819.70 on December 16, 2013 to Judgment Debtor's BOC account ending in 9288 as the beneficiary.

143. Attached hereto as **Exhibit 137** is a true and correct copy of a wire transfer record produced by Citibank, a bank at which BOC has a correspondent account, on August 7, 2017, for a wire transfer for \$1,775.82 on September 11, 2013 to Judgment Debtor's BOC account ending in 2560 as the beneficiary.

144. Attached hereto as **Exhibit 138** is a true and correct copy of a wire transfer record produced by Citibank, a bank at which BOC has a correspondent account, on August 7, 2017, for a wire transfer for \$918.22 on May 13, 2013 to Judgment Debtor's BOC account ending in 8219 as the beneficiary.

145. Attached hereto as **Exhibit 139** is a true and correct copy of a wire transfer record produced by Citibank, a bank at which BOC has a correspondent account, on August 7, 2017, for a wire transfer for \$2,158.76 on May 17, 2013 to Judgment Debtor's BOC account ending in 8348 as the beneficiary.

146. Attached hereto as **Exhibit 140** is a true and correct copy of a wire transfer record produced by Citibank, a bank at which BOC has a correspondent account, on August 7, 2017, for a wire transfer for \$3,304.95 on May 16, 2013 to Judgment Debtor's BOC account ending in 0032 as the beneficiary.

147. Attached hereto as **Exhibit 141** is a true and correct copy of a wire transfer record produced by Citibank, a bank at which BOC has a correspondent account, on August 7, 2017, for a wire transfer for \$1,877.33 on May 20, 2013 to Judgment Debtor's BOC account ending in 8912 as the beneficiary.

148. Attached hereto as **Exhibit 142** is a true and correct copy of a wire transfer record produced by Citibank, a bank at which BOC has a correspondent account, on August 7, 2017, for a wire transfer for \$4,607.05 on September 20, 2013 to Judgment Debtor's BOC account ending in 8046 as the beneficiary.

149. Attached hereto as **Exhibit 143** is a true and correct copy of a wire transfer record produced by Citibank, a bank at which BOC has a correspondent account, on August 7, 2017, for a wire transfer for \$198.91 on May 15, 2013 to Judgment Debtor's BOC account ending in 5303 as the beneficiary.

150. Attached hereto as **Exhibit 144** is a true and correct copy of a wire transfer record produced by Citibank, a bank at which BOC has a correspondent account, on August 7, 2017, for a wire transfer for \$1,151.77 on November 3, 2011 to Judgment Debtor's BOC account ending in 2556 as the beneficiary.

151. Attached hereto as **Exhibit 145** is a true and correct copy of a wire transfer record produced by Citibank, a bank at which BOC has a correspondent account, on August 7, 2017, for a wire transfer for \$872.11 on October 27, 2011 to Judgment Debtor's BOC account ending in 8298 as the beneficiary.

152. Attached hereto as **Exhibit 146** is a true and correct copy of a wire transfer record produced by Citibank, a bank at which BOC has a correspondent account, on August 7, 2017, for

five wire transfers totaling \$7,868.00 from November 25, 2011 through December 6, 2011 to Judgment Debtor's BOC account ending in 4652 as the beneficiary.

153. Attached hereto as **Exhibit 147** is a true and correct copy of a wire transfer record produced by Citibank, a bank at which BOC has a correspondent account, on August 7, 2017, for five wire transfers totaling \$9,293.00 from November 1, 2011 through November 17, 2011 to Judgment Debtor's BOC account ending in 2066 as the beneficiary.

154. Attached hereto as **Exhibit 148** is a true and correct copy of a wire transfer record produced by Citibank, a bank at which BOC has a correspondent account, on August 7, 2017, for a wire transfer for \$1,935.29 on October 25, 2011 to Judgment Debtor's BOC account ending in 9759 as the beneficiary.

155. Attached hereto as **Exhibit 149** is a true and correct copy of a wire transfer record produced by Citibank, a bank at which BOC has a correspondent account, on August 7, 2017, for a wire transfer for \$440.29 on September 20, 2011 to Judgment Debtor's BOC account ending in 8239 as the beneficiary.

156. Attached hereto as **Exhibit 150** is a true and correct copy of a wire transfer record produced by Citibank, a bank at which BOC has a correspondent account, on August 7, 2017, for a wire transfer for \$2,070.35 on October 25, 2011 to Judgment Debtor's BOC account ending in 9790 as the beneficiary.

157. Attached hereto as **Exhibit 151** is a true and correct copy of a wire transfer record produced by Citibank, a bank at which BOC has a correspondent account, on August 7, 2017, for five wire transfers totaling \$22,055 from October 20, 2012 through February 26, 2013 to Judgment Debtor's BOC account ending in 7200 as the beneficiary.

158. Attached hereto as **Exhibit 152** is a true and correct copy of a wire transfer record produced by Citibank, a bank at which BOC has a correspondent account, on August 7, 2017, for a wire transfer for \$1,731.89 on November 10, 2011 to Judgment Debtor's BOC account ending in 2499 as the beneficiary.

159. Attached hereto as **Exhibit 153** is a true and correct copy of a wire transfer record produced by Citibank, a bank at which BOC has a correspondent account, on August 7, 2017, for a wire transfer for \$5,430.86 on October 12, 2011 to Judgment Debtor's BOC account ending in 6361 as the beneficiary.

160. Attached hereto as **Exhibit 154** is a true and correct copy of a wire transfer record produced by Citibank, a bank at which BOC has a correspondent account, on August 7, 2017, for a wire transfer for \$1,505.61 on November 8, 2011 to Judgment Debtor's BOC account ending in 2482 as the beneficiary.

161. Attached hereto as **Exhibit 155** is a true and correct copy of a wire transfer record produced by Citibank, a bank at which BOC has a correspondent account, on August 7, 2017, for a wire transfer for \$26,386.03 on February 25, 2013 to Judgment Debtor's BOC account ending in 3833 as the beneficiary.

162. Attached hereto as **Exhibit 156** is a true and correct copy of a wire transfer record produced by Citibank, a bank at which BOC has a correspondent account, on August 7, 2017, for a wire transfer for \$1,506.21 on November 13, 2013 to Judgment Debtor's BOC account ending in 4730 as the beneficiary.

163. Attached hereto as **Exhibit 157** is a true and correct copy of a wire transfer record produced by Citibank, a bank at which BOC has a correspondent account, on August 7, 2017, for

a wire transfer for \$7,545.13 on September 19, 2013 to Judgment Debtor's BOC account ending in 1983 as the beneficiary.

164. Attached hereto as **Exhibit 158** is a true and correct copy of a wire transfer record produced by Citibank, a bank at which BOC has a correspondent account, on August 7, 2017, for a wire transfer for \$12,035.81 on May 8, 2012 to Judgment Debtor's BOC account ending in 8486 as the beneficiary.

165. Attached hereto as **Exhibit 159** is a true and correct copy of a wire transfer record produced by Citibank, a bank at which BOC has a correspondent account, on August 7, 2017, for a wire transfer for \$2,101.77 on November 13, 2013 to Judgment Debtor's BOC account ending in 5983 as the beneficiary.

166. Attached hereto as **Exhibit 160** is a true and correct copy of a wire transfer record produced by Citibank, a bank at which BOC has a correspondent account, on August 7, 2017, for a wire transfer for \$3,570.99 on November 15, 2013 to Judgment Debtor's BOC account ending in 5109 as the beneficiary.

167. Attached hereto as **Exhibit 161** is a true and correct copy of a wire transfer record produced by Citibank, a bank at which BOC has a correspondent account, on August 7, 2017, for a wire transfer for \$15,729.22 on May 24, 2011 to Judgment Debtor's BOC account ending in 2632 as the beneficiary.

168. Attached hereto as **Exhibit 162** is a true and correct copy of a wire transfer record produced by Citibank, a bank at which BOC has a correspondent account, on August 7, 2017, for a wire transfer for \$7,346.03 on July 28, 2010 to Judgment Debtor's BOC account ending in 4490 as the beneficiary.

169. Attached hereto as **Exhibit 163** is a true and correct copy of a wire transfer record produced by Citibank, a bank at which BOC has a correspondent account, on August 7, 2017, for a wire transfer for \$12,499.81 on June 14, 2011 to Judgment Debtor's BOC account ending in 0446 as the beneficiary.

170. Attached hereto as **Exhibit 164** is a true and correct copy of a wire transfer record produced by Citibank, a bank at which BOC has a correspondent account, on August 17, 2017, for two wire transfers totaling \$8,534.06 on January 7, 2009 and January 13, 2009 to Judgment Debtor's BOC account ending in 5514 as the beneficiary.

171. Attached hereto as **Exhibit 165** is a true and correct copy of a wire transfer record produced by Citibank, a bank at which BOC has a correspondent account, on August 17, 2017, for a wire transfer for \$17,067.98 on January 23, 2013 to Judgment Debtor's BOC account ending in 1330 as the beneficiary.

172. Attached hereto as **Exhibit 166** is a true and correct copy of a wire transfer record produced by Citibank, a bank at which BOC has a correspondent account, on August 17, 2017, for a wire transfer for \$2,447.01 on July 28, 2011 to Judgment Debtor's BOC account ending in 1504 as the beneficiary.

173. Attached hereto as **Exhibit 167** is a true and correct copy of a wire transfer record produced by Citibank, a bank at which BOC has a correspondent account, on August 17, 2017, for 30 wire transfers totaling \$197,060.00 from October 28, 2009 through December 21, 2010 to Judgment Debtor's BOC account ending in 4357 as the beneficiary.

174. Attached hereto as **Exhibit 168** is a true and correct copy of a wire transfer record produced by Citibank, a bank at which BOC has a correspondent account, on August 17, 2017,

for a wire transfer for \$21,995.26 on January 14, 2013 to Judgment Debtor's BOC account ending in 9490 as the beneficiary.

175. Attached hereto as **Exhibit 169** is a true and correct copy of a wire transfer record produced by Citibank, a bank at which BOC has a correspondent account, on August 17, 2017, for 123 wire transfers totaling \$854,760.54 from January 8, 2008 through May 14, 2010 to Judgment Debtor's BOC account ending in 4276 as the beneficiary.

176. Attached hereto as **Exhibit 170** is a true and correct copy of a wire transfer record produced by Citibank, a bank at which BOC has a correspondent account, on August 17, 2017, for 74 wire transfers totaling \$574,096.61 from January 28, 2008 through May 18, 2010 to Judgment Debtor's BOC account ending in 2839 as the beneficiary.

177. Attached hereto as **Exhibit 171** is a true and correct copy of a wire transfer record produced by Citibank, a bank at which BOC has a correspondent account, on August 17, 2017, for three wire transfers totaling \$38,593.17 from March 16, 2012 through April 3, 2012 to Judgment Debtor's BOC account ending in 6514 as the beneficiary.

178. Attached hereto as **Exhibit 172** is a true and correct copy of a wire transfer record produced by Citibank, a bank at which BOC has a correspondent account, on August 17, 2017, for a wire transfer for \$1,715.52 on May 29, 2013 to Judgment Debtor's BOC account ending in 4952 as the beneficiary.

179. Attached hereto as **Exhibit 173** is a true and correct copy of a wire transfer record produced by Citibank, a bank at which BOC has a correspondent account, on August 17, 2017, for a wire transfer for \$4,797.38 on May 14, 2013 to Judgment Debtor's BOC account ending in 1563 as the beneficiary.

180. Attached hereto as **Exhibit 174** is a true and correct copy of a wire transfer record produced by Citibank, a bank at which BOC has a correspondent account, on August 17, 2017, for a wire transfer for \$4,287.20 on March 21, 2013 to Judgment Debtor's BOC account ending in 8531 as the beneficiary.

181. Attached hereto as **Exhibit 175** is a true and correct copy of a wire transfer record produced by Citibank, a bank at which BOC has a correspondent account, on August 17, 2017, for a wire transfer for \$8,568.15 on May 7, 2013 to Judgment Debtor's BOC account ending in 9583 as the beneficiary.

182. Attached hereto as **Exhibit 176** is a true and correct copy of a wire transfer record produced by Citibank, a bank at which BOC has a correspondent account, on August 17, 2017, for two wire transfers totaling \$11,460.25 on April 16, 2012 and July 3, 2012 to Judgment Debtor's BOC account ending in 6299 as the beneficiary.

183. Attached hereto as **Exhibit 177** is a true and correct copy of a wire transfer record produced by Citibank, a bank at which BOC has a correspondent account, on August 17, 2017, for a wire transfer for \$7,379.12 on December 23, 2010 to Judgment Debtor's BOC account ending in 3848 as the beneficiary.

184. Attached hereto as **Exhibit 178** is a true and correct copy of a wire transfer record produced by Citibank, a bank at which BOC has a correspondent account, on August 17, 2017, for a wire transfer for \$2,028.68 on November 11, 2011 to Judgment Debtor's BOC account ending in 2947 as the beneficiary.

185. Attached hereto as **Exhibit 179** is a true and correct copy of a wire transfer record produced by Citibank, a bank at which BOC has a correspondent account, on August 17, 2017,

for a wire transfer for \$4,850.44 on September 30, 2010 to Judgment Debtor's BOC account ending in 6207 as the beneficiary.

186. Attached hereto as **Exhibit 180** is a true and correct copy of a wire transfer record produced by Citibank, a bank at which BOC has a correspondent account, on August 17, 2017, for 15 wire transfers totaling \$63,397.25 from June 24, 2008 through February 4, 2010 to Judgment Debtor's BOC account ending in 7539 as the beneficiary.

187. Attached hereto as **Exhibit 181** is a true and correct copy of a wire transfer record produced by Citibank, a bank at which BOC has a correspondent account, on August 17, 2017, for a wire transfer for \$12,276.09 on September 14, 2010 to Judgment Debtor's BOC account ending in 6662 as the beneficiary.

188. Attached hereto as **Exhibit 182** is a true and correct copy of a wire transfer record produced by Citibank, a bank at which BOC has a correspondent account, on August 17, 2017, for a wire transfer for \$9,486.90 on February 23, 2010 to Judgment Debtor's BOC account ending in 6720 as the beneficiary.

189. Attached hereto as **Exhibit 183** is a true and correct copy of a wire transfer record produced by Citibank, a bank at which BOC has a correspondent account, on August 17, 2017, for a wire transfer for \$17,820.94 on February 9, 2010 to Judgment Debtor's BOC account ending in 3259 as the beneficiary.

190. Attached hereto as **Exhibit 184** is a true and correct copy of a wire transfer record produced by Citibank, a bank at which BOC has a correspondent account, on August 17, 2017, for a wire transfer for \$541.89 on December 13, 2010 to Judgment Debtor's BOC account ending in 5284 as the beneficiary.

191. Attached hereto as **Exhibit 185** is a true and correct copy of a wire transfer record produced by Citibank, a bank at which BOC has a correspondent account, on August 17, 2017, for a wire transfer for \$2,044.31 on September 30, 2010 to Judgment Debtor's BOC account ending in 6654 as the beneficiary.

192. Attached hereto as **Exhibit 186** is a true and correct copy of a wire transfer record produced by Citibank, a bank at which BOC has a correspondent account, on August 17, 2017, for 16 wire transfers totaling \$66,351.66 from October 26, 2009 through March 29, 2012 to Judgment Debtor's BOC account ending in 3094 as the beneficiary.

193. Attached hereto as **Exhibit 187** is a true and correct copy of a wire transfer record produced by Citibank, a bank at which BOC has a correspondent account, on August 17, 2017, for a wire transfer for \$3,070.59 on April 9, 2012 to Judgment Debtor's BOC account ending in 3151 as the beneficiary.

194. Attached hereto as **Exhibit 188** is a true and correct copy of a wire transfer record produced by Citibank, a bank at which BOC has a correspondent account, on August 17, 2017, for a wire transfer for \$454.15 on April 11, 2013 to Judgment Debtor's BOC account ending in 7934 as the beneficiary.

195. Attached hereto as **Exhibit 189** is a true and correct copy of a wire transfer record produced by Citibank, a bank at which BOC has a correspondent account, on August 17, 2017, for a wire transfer for \$1,542.67 on April 11, 2013 to Judgment Debtor's BOC account ending in 8369 as the beneficiary.

196. Attached hereto as **Exhibit 190** is a true and correct copy of a wire transfer record produced by Citibank, a bank at which BOC has a correspondent account, on August 17, 2017,

for a wire transfer for \$2,547.42 on June 6, 2013 to Judgment Debtor's BOC account ending in 5608 as the beneficiary.

197. Attached hereto as **Exhibit 191** is a true and correct copy of a wire transfer record produced by Citibank, a bank at which BOC has a correspondent account, on August 17, 2017, for 12 wire transfers totaling \$32,269.19 from June 14, 2011 through March 1, 2012 to Judgment Debtor's BOC account ending in 8931 as the beneficiary.

198. Attached hereto as **Exhibit 192** is a true and correct copy of a wire transfer record produced by Citibank, a bank at which BOC has a correspondent account, on August 17, 2017, for a wire transfer for \$2,272.02 on April 29, 2008 to Judgment Debtor's BOC account ending in 9995 as the beneficiary.

199. Attached hereto as **Exhibit 193** is a true and correct copy of a wire transfer record produced by Citibank, a bank at which BOC has a correspondent account, on August 17, 2017, for 17 wire transfers totaling \$76,265.24 from April 20, 2010 through February 10, 2012 to Judgment Debtor's BOC account ending in 0209 as the beneficiary.

200. Attached hereto as **Exhibit 194** is a true and correct copy of a wire transfer record produced by Citibank, a bank at which BOC has a correspondent account, on August 17, 2017, for a wire transfer for \$1,100 on March 22, 2011 to Judgment Debtor's BOC account ending in 6072 as the beneficiary.

201. Attached hereto as **Exhibit 195** is a true and correct copy of a wire transfer record produced by Citibank, a bank at which BOC has a correspondent account, on August 17, 2017, for four wire transfers totaling \$19,384.29 from July 17, 2009 through March 31, 2010 to Judgment Debtor's BOC account ending in 5786 as the beneficiary.

202. Attached hereto as **Exhibit 196** is a true and correct copy of a wire transfer record produced by Citibank, a bank at which BOC has a correspondent account, on August 17, 2017, for a wire transfer for \$1,931.12 on February 21, 2013 to Judgment Debtor's BOC account ending in 9196 as the beneficiary.

203. Attached hereto as **Exhibit 197** is a true and correct copy of a wire transfer record produced by Citibank, a bank at which BOC has a correspondent account, on August 17, 2017, for a wire transfer for \$21,359.15 on December 26, 2012 to Judgment Debtor's BOC account ending in 3327 as the beneficiary.

204. Attached hereto as **Exhibit 198** is a true and correct copy of a wire transfer record produced by Citibank, a bank at which BOC has a correspondent account, on August 17, 2017, for 23 wire transfers totaling \$219,887.05 from April 30, 2008 through June 23, 2009 to Judgment Debtor's BOC account ending in 2692 as the beneficiary.

205. Attached hereto as **Exhibit 199** is a true and correct copy of a wire transfer record produced by Citibank, a bank at which BOC has a correspondent account, on August 17, 2017, for a wire transfer for \$50,817.42 on April 7, 2011 to Judgment Debtor's BOC account ending in 5384 as the beneficiary.

206. Attached hereto as **Exhibit 200** is a true and correct copy of a wire transfer record produced by Citibank, a bank at which BOC has a correspondent account, on August 17, 2017, for a wire transfer for \$29,427.15 on June 21, 2011 to Judgment Debtor's BOC account ending in 1858 as the beneficiary.

207. Attached hereto as **Exhibit 201** is a true and correct copy of a wire transfer record produced by Citibank, a bank at which BOC has a correspondent account, on August 17, 2017,

for a wire transfer for \$26,861.76 on March 24, 2011 to Judgment Debtor's BOC account ending in 5649 as the beneficiary.

208. Attached hereto as **Exhibit 202** is a true and correct copy of a wire transfer record produced by Citibank, a bank at which BOC has a correspondent account, on August 17, 2017, for nine wire transfers totaling \$37,585.81 from December 15, 2009 through November 22, 2013 to Judgment Debtor's BOC account ending in 5787 as the beneficiary.

209. Attached hereto as **Exhibit 203** is a true and correct copy of a wire transfer record produced by Citibank, a bank at which BOC has a correspondent account, on August 17, 2017, for two wire transfers totaling \$4,095.32 on December 11, 2012 and March 13, 2013 to Judgment Debtor's BOC account ending in 6441 as the beneficiary.

210. Attached hereto as **Exhibit 204** is a true and correct copy of a wire transfer record produced by Citibank, a bank at which BOC has a correspondent account, on August 17, 2017, for 25 wire transfers totaling \$253,88.19 from June 4, 2010 through May 5, 2011 to Judgment Debtor's BOC account ending in 9683 as the beneficiary.

211. Attached hereto as **Exhibit 205** is a true and correct copy of a wire transfer record produced by Citibank, a bank at which BOC has a correspondent account, on February 20, 2018, for a wire transfer for \$1,610 on March 7, 2017 to Judgment Debtor's BOC account ending in 0446 as the beneficiary.

212. Attached hereto as **Exhibit 206** is a true and correct copy of a wire transfer records produced by JPMorgan Chase, a bank at which BOC has a correspondent account, on September 28, 2017, for the following wires:

- a. Seven wire transfers totaling \$674.95 from August 19, 2010 through June 2, 2014 to Judgment Debtor's BOC account ending in 5786 as the beneficiary. Ex. 206 at 15-22.
- b. Two wire transfers totaling \$3,536.00 on September 28, 2011 and January 3, 2013 to Judgment Debtor's BOC account ending in 5787 as the beneficiary. Ex. 206 at 3-5.
- c. Five wire transfers totaling \$8,410.00 from December 14, 2010 through March 29, 2011 to Judgment Debtor's BOC account ending in 1725 as the beneficiary. Ex. 206 at 9-14.
- d. Two wire transfers totaling \$1,105.00 on February 2, 2009 and February 11, 2009 to Judgment Debtor's BOC account ending in 0358 as the beneficiary. Ex. 206 at 6-8.

213. Attached hereto as **Exhibit 207** is a true and correct copy of a wire transfer record produced by JPMorgan Chase, a bank at which BOC has a correspondent account, on January 26, 2018, for 56 wire transfers totaling \$303,196.00 from January 9, 2013 through January 25, 2015 to Judgment Debtor's BOC account ending in 0446 as the beneficiary.

214. Attached hereto as **Exhibit 208** is a true and correct copy of a wire transfer record produced by JPMorgan Chase, a bank at which BOC has a correspondent account, on January 26, 2018, for six wire transfers totaling \$3,978.80 from January 4, 2011 through July 7, 2017 to Judgment Debtor's BOC account ending in 2514 as the beneficiary.

215. Attached hereto as **Exhibit 209** is a true and correct copy of a wire transfer record produced by JPMorgan Chase, a bank at which BOC has a correspondent account, on January

26, 2018, for two wire transfers totaling \$124.79 on July 7, 2017 and July 31, 2017 to Judgment Debtor's BOC account ending in 8519 as the beneficiary.

216. Attached hereto as **Exhibit 210** is a true and correct copy of a wire transfer record produced by JPMorgan Chase, a bank at which BOC has a correspondent account, on January 26, 2018, for nine wire transfers totaling \$43,350.00 from March 23, 2017 through July 25, 2017 to Judgment Debtor's BOC account ending in 8870 as the beneficiary.

217. Attached hereto as **Exhibit 211** is a true and correct copy of a wire transfer record produced by JPMorgan Chase, a bank at which BOC has a correspondent account, on January 26, 2018, for a wire transfer for \$106.37 on June 2, 2017 to Judgment Debtor's BOC account ending in 5300 as the beneficiary.

218. Attached hereto as **Exhibit 212** is a true and correct copy of a wire transfer record produced by JPMorgan Chase, a bank at which BOC has a correspondent account, on January 26, 2018, for 12 wire transfers totaling \$2,692.68 from June 14, 2013 through June 2, 2017 to Judgment Debtor's BOC account ending in 2751 as the beneficiary.

219. Attached hereto as **Exhibit 213** is a true and correct copy of a wire transfer record produced by JPMorgan Chase, a bank at which BOC has a correspondent account, on January 26, 2018, for a wire transfer for \$162.00 on July 31, 2017 to Judgment Debtor's BOC account ending in 6324 as the beneficiary.

220. Attached hereto as **Exhibit 214** is a true and correct copy of a wire transfer record produced by Deutsche Bank, a bank at which BOC has a correspondent account, on February 21, 2018, for two wire transfers totaling \$412.70 on June 22, 2012 and May 7, 2014 for Judgment Debtor's BOC account ending in 5786 as the beneficiary.

221. Attached hereto as **Exhibit 215** is a true and correct copy of a wire transfer record produced by Deutsche Bank, a bank at which BOC has a correspondent account, on February 21, 2018, for four wire transfers totaling \$1,333.66 from July 9, 2013 through October 16, 2013 for Judgment Debtor's BOC account ending in 5787 as the beneficiary.

222. Attached hereto as **Exhibit 216** is a true and correct copy of a wire transfer record produced by Deutsche Bank, a bank at which BOC has a correspondent account, on February 21, 2018, for three wire transfers totaling \$14,815.00 on January 17, 2013 through April 22, 2013 for Judgment Debtor's BOC account ending in 0446 as the beneficiary.

223. Attached hereto as **Exhibit 217** is a true and correct copy of a wire transfer record produced by Deutsche Bank, a bank at which BOC has a correspondent account, on February 21, 2018, for a wire transfer for \$61.10 on July 15, 2012 for Judgment Debtor's BOC account ending in 2514 as the beneficiary.

224. Attached hereto as **Exhibit 218** is a true and correct copy of a wire transfer record produced by Deutsche Bank, a bank at which BOC has a correspondent account, on February 21, 2018, for four wire transfers totaling \$669.67 on December 24, 2012 through October 25, 2017 for Judgment Debtor's BOC account ending in 2751 as the beneficiary.

225. Attached hereto as **Exhibit 219** is a true and correct copy of a wire transfer record produced by Deutsche Bank, a bank at which BOC has a correspondent account, on February 21, 2018, for a wire transfer for \$96.00 on September 7, 2016 for Judgment Debtor's BOC account ending in 6324 as the beneficiary.

226. In accordance with Fed. R. Civ. P. 5.2(a), the bank account numbers referenced in Exhibits 129-219 have been redacted so that only the last four digits are visible.

227. Attached hereto as **Exhibit 220** is a true and correct copy of excerpts from BOC's 2015 Annual Report.

228. Attached hereto as **Exhibit 221** is a true and correct copy of excerpts from BOC's 2016 Interim Report.

229. Attached hereto as **Exhibit 222** is a true and correct copy of a webpage from BOC's website, "Bank of China America Branches," which indicates that BOC has a branch at 410 Madison Avenue in New York, New York and one on 42 East Broadway, New York, New York as well as other locations throughout the United States.

230. Attached hereto as **Exhibit 223** is a true and correct copy of an FDIC financial report for BOC, which indicated that BOC is an active bank, insured since November 16, 1981, and its headquarters located at 1045 Avenue of the Americas, New York, New York 10018.

231. Attached hereto as **Exhibit 224** is a true and correct copy of an FDIC report for BOC, which indicated that BOC is an active bank, insured since September 26, 1985, and has its headquarters located 4235 Main Street, Flushing, New York 11355.

232. Attached hereto as **Exhibit 225** is true and correct copy of a search result from ACRIS, which indicates BOC has property in Manhattan and Queens.

233. Attached hereto as **Exhibit 226** is a true and correct copy of search results for BOC from the New York State Department of State, Uniform Commercial Code.

234. Attached hereto as **Exhibit 227** is a true and correct copy of a record from the New York City Department of Finance Office of the City Register, which indicates that BOC has a mortgage on a property located at 20 West 53rd Street in New York, New York.

235. Attached hereto as **Exhibit 228** is a true and correct copy of a record from The Clearing House Payments Company, which indicates that ABC, BOCOM, CCB, CMB, ICBC and BOC are all CHIPS participants.

236. Attached hereto as **Exhibit 229** is a true and correct copy of a record from The Clearing House Payments Company, which indicates BOC NY Branch is a CHIPS participant.

237. Attached hereto as **Exhibit 230** is a true and correct copy from the Fedwire directory, which indicates BOC NY is a Fedwire participant.

238. Attached hereto as **Exhibit 231** is a true and correct copy of a search result from the DFS, which indicates that BOC is registered with and supervised by DFS.

239. Attached hereto as **Exhibit 232** is a true and correct copy of excerpts from BOC Hong Kong (Holdings) Limited Annual Report 2016, which indicates that BOC Credit Card (International) Limited, is a subsidiary of BOC.

240. Attached hereto as **Exhibit 233** is a true and correct copy of a webpage from BOC's website, "Bank of China New York Branch," which can be found at http://www.bankofchina.com/us/en/aboutus/ab1/201305/t20130522_2733306.html.

241. Attached hereto as **Exhibit 234** is a true and correct copy of a webpage in Chinese from BOC website, "Bank of China Approved as Clearing Bank for Renminbi Business in the United States," which can be found at http://www.bankofchina.com/aboutboc/bi1/20160921_7705706.html, followed by a certified English translation of the webpage.

242. Attached hereto as **Exhibit 235** is a true and correct copy of a webpage from BOC's website, "24-hour Clearing Service and China Domestic Clearing Service," which can be found at http://www.bankofchina.com/us/en/clearing/201310/t20131022_2733237.html.

243. Attached hereto as **Exhibit 236** is a true and correct copy of a webpage from BOC's website, "Outward Remittance," which can be found at http://www.bankofchina.com/us/en/pbservice/pb3/201307/t20130716_2733246.html.

244. Attached hereto as **Exhibit 237** is a true and correct copy of a webpage from BOC's website, "RMB Pre-Settlement Remittance," which can be found at http://www.bankofchina.com/us/en/pbservice/pb3/201307/t20130716_2733245.html.

245. Attached hereto as **Exhibit 238** is a true and correct copy of a webpage from BOC's website, "Syndicated Loan," which can be found at http://www.bankofchina.com/us/en/cbservice/cb4/201306/t20130603_2733225.html

246. Attached hereto as **Exhibit 239** is a true and correct copy of a webpage from BOC's website, "Foreign Currency Exchange," which can be found at http://www.bankofchina.com/us/en/pbservice/pb3/201307/t20130716_2733248.html.

247. Attached hereto as **Exhibit 240** is a true and correct copy of a webpage from BOC's website, "Foreign Exchange Swap," which can be found at http://www.bankofchina.com/us/en/cbservice/cb3/201306/t20130603_2733222.html.

248. Attached hereto as **Exhibit 241** is a true and correct copy of a webpage in Chinese from BOC website, "Cross-border Fund Management," which can be found at http://www.boc.cn/cbservice/cb14/201507/t20150731_5397809.html, followed by a certified English translation of the webpage.

249. Attached hereto as **Exhibit 242** is a true and correct copy of a webpage in Chinese from BOC website, "Going Abroad - Introduction of Overseas Branches and Subsidiaries," which can be found at

http://www.bankofchina.com/pbservice/pb7/201310/t20131014_2535212.html#usa, followed by a certified English translation of the webpage.

250. Attached hereto as **Exhibit 243** is a true and correct copy of a webpage in Chinese from BOC website, “Great Wall Overseas Study Debit Card,” which can be found at http://www.bankofchina.com/bcservices/bc2/201509/t20150908_5588392.html, followed by a certified English translation of the webpage.

251. Attached hereto as **Exhibit 244** is a true and correct copy of a webpage from BOC’s website, “‘Mei Hao Qian Cheng’ Overseas Student Account,” which can be found at http://www.bankofchina.com/us/en/pbservice/pb1/201701/t20170103_10859322.html.

252. Attached hereto as **Exhibit 245** is a true and correct copy of a document produced by Visa, dated November 26, 2013, which indicates that ABC, BOCOM, and BOC Credit Card were the acquiring banks for transactions with Judgment Debtors.

253. Attached hereto as **Exhibit 246** is a true and correct copy of a document produced by Visa, dated May 20, 2014, which indicates that BOC was an acquiring bank for transactions with Judgment Debtors.

254. Attached hereto as **Exhibit 247** is a true and correct copy of a document produced by Visa, dated October 21, 2017, which indicates that BOCOM, BOC, and BOC Credit Card were the acquiring banks for transactions with Judgment Debtors.

255. Attached hereto as **Exhibit 248** is a true and correct copy of excerpts from Visa Core Rules and Visa Product and Service Rule, a full version available at <https://usa.visa.com/dam/VCOM/download/about-visa/visa-rules-public.pdf>.

256. Attached hereto as **Exhibit 249** is a true and correct copy of a document produced by Citibank on February 20, 2018, indicating that ABC, BOCOM, BOC, CCB, CMB and ICBC all have correspondent bank accounts at Citibank.

257. Attached hereto as **Exhibit 250** is a true and correct copy of the subpoena served in the *Gucci America, Inc. v. Weixing Li*, No. 10-cv-4974, on July 26, 2010.

258. Attached hereto as **Exhibit 251** is a true and correct copy of a speech given by President Barack Obama at the Export-Import Bank's Annual Conference on March 11, 2010, available at <https://obamawhitehouse.archives.gov/the-press-office/remarks-president-export-import-banks-annual-conference>.

259. Attached hereto as **Exhibit 252** is a true and correct copy of President Trump's State of the Union Address, given on January 30, 2018, available at <https://www.whitehouse.gov/briefings-statements/president-donald-j-trumps-state-union-address/>.

260. Attached hereto as **Exhibit 253** is a true and correct copy of a press release by President Bush's Office of the Press Secretary, "Fact Sheet: Protecting American Innovation," dated October 13, 2008, available at <https://georgewbush-whitehouse.archives.gov/news/releases/2008/10/20081013-7.html>.

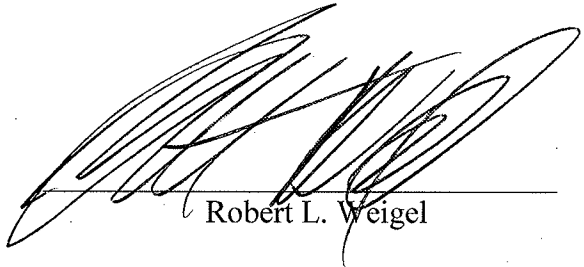
261. Attached hereto as **Exhibit 254** is a true and correct copy of an email from A. Coyle to A. Davies and P. Carberry, dated August 21, 2015, attaching the order and Judgment entered into by Judge Scheindlin.

262. Attached hereto as **Exhibit 255** is a true and correct copy of pages from the MasterCard Rules, dated June 1, 2017, regarding the Choice of Laws provision that governs all disputes involving Mastercard.

263. Attached hereto as **Exhibit 256** is a true and correct copy of a letter from Mastercard to L. Nagin, dated October 23, 2017, which indicated that BOC Credit Card and BOCOM were the acquiring banks for transactions with Judgment Debtors made using Mastercard credit cards.

264. Attached hereto as **Exhibit 257** is a true and correct copy of a subpoena served on Mastercard on January 29, 2018.

Dated: New York, New York
March 16, 2018



Robert L. Weigel